

This document gives pertinent information concerning the reissuance of the VPDES Permit listed below. This permit is being processed as a Minor, Industrial permit. The discharge results from the operation of a pre-cast concrete manufacturing operation. This permit action consists of updating the proposed effluent limits to reflect the current Virginia WQS and updating permit language, as appropriate, to reflect current boilerplate. The effluent limitations and special conditions contained in this permit will maintain the Water Quality Standards of 9VAC25-260-00 et seq.

1. Facility Name and Mailing Address: Adaptive Concrete Solutions
4215 Lafayette Center Drive,
Ste 1
Chantilly, VA 20151
SIC Code : 3273
Facility Location: 44146 Wade Road
Chantilly, VA 20151
County: Loudoun
Facility Contact Name: Troy King
Telephone Number: (703) 222-6969
2. Permit No.: VA0090441
Expiration Date of previous permit: 11/21/2010
Other VPDES Permits associated with this facility: Not Applicable
Other Permits associated with this facility: Air #72365
E2/E3/E4 Status: Not Applicable
3. Owner Name: Thomas Ogorchock
Owner Contact/Title: Thomas Ogorchock, Owner
Telephone Number: (703) 327-4334
4. Application Complete Date: June 16, 2010
Permit Drafted By: Alison Thompson
Date Drafted: August 31, 2010
Draft Permit Reviewed By: Joan Crowther
Date Reviewed: September 23, 2010
Public Comment Period : Start Date: 11/24/2010
End Date: December 23, 2010
5. Receiving Waters Information: See Attachment 1 for the Flow Frequency Determination
Receiving Stream Name Outfall 001: Sand Branch Outfall 002: UT to Cub Run
Drainage Area at outfall: <5 sq.mi.
Stream Basin: Potomac Subbasin: Potomac
Section: 7a Stream Class: III
Special Standards: g Waterbody ID: VAN-A22R
7Q10 Low Flow: 0 MGD 7Q10 High Flow: 0 MGD
1Q10 Low Flow: 0 MGD 1Q10 High Flow: 0 MGD
Harmonic Mean Flow: 0 MGD 30Q5 Flow: 0 MGD
303(d) Listed: No 30Q10 Flow: 0 MGD
TMDL Approved: Yes for Bull Run Benthic and Bacteria
Date TMDL Approved: 9/26/2006 (benthic)
11/15/2006 (bacteria)
TMDL Approved: No for Cub Run Bacteria and for Bull Run PCB
6. Statutory or Regulatory Basis for Special Conditions and Effluent Limitations:

<u>✓</u> State Water Control Law <u>✓</u> Clean Water Act <u>✓</u> VPDES Permit Regulation <u>✓</u> EPA NPDES Regulation	<u>✓</u> EPA Guidelines <u>✓</u> Water Quality Standards <u>✓</u> NPDES Industrial Rating Worksheet (Attachment 2)
---	---

8. Reliability Class: Not Applicable

9. Permit Characterization:

<input checked="" type="checkbox"/> Private	<input type="checkbox"/> Effluent Limited	<input type="checkbox"/> Possible Interstate Effect
<input type="checkbox"/> Federal	<input checked="" type="checkbox"/> Water Quality Limited	<input type="checkbox"/> Compliance Schedule Required
<input type="checkbox"/> State	<input type="checkbox"/> Toxics Monitoring Program Required	<input type="checkbox"/> Interim Limits in Permit
<input type="checkbox"/> POTW	<input type="checkbox"/> Pretreatment Program Required	<input type="checkbox"/> Interim Limits in Other Document
<input checked="" type="checkbox"/> TMDL		

10. **Wastewater Sources and Treatment Description:**

The water discharged from this facility is stormwater associated with an industrial activity only. No process water is commingled or discharged from this site. Stormwater flows to one of the two stormwater retention ponds prior to discharge. Outfall 001 also has pH adjustment prior to discharge.

TABLE 1 – Outfall Description				
Outfall Number	Discharge Sources	Treatment	Flow	Outfall Latitude and Longitude
001	Industrial Stormwater	Sedimentation, pH adjustment	Varies	38°55'15" 77°28'30"
002	Industrial Stormwater	Sedimentation	Varies	38°55'40" 77°28'30"
See Attachment 3 for (Herndon, DEQ #205B) topographic map.				

11. **Sludge Treatment and Disposal Methods:**

This is an industrial site that does not generate sewage sludge.

12. **Discharges, Intakes, Monitoring Stations, Other Items in Vicinity of Discharge**

TABLE 2	
VAG846023	Chantilly Crushed Stone Non-Metallic Mineral Mining facility discharge to Sand Branch
VAG110094	Dubrook Concrete – Chantilly Ready Mixed Concrete facility discharge to Sand Branch
VAG110089	Virginia Concrete – Chantilly Ready Mixed Concrete facility discharge to UT, Sand Branch
VAR530019	APAC-Virginia - Chantilly Asphalt Plant discharge to Sand Branch
VA0089541	MWAA – Washington Dulles International Airport
VA0091430	Loudoun Composting

13. Material Storage:

The list of chemicals stored is found in Attachment 4.

14. Site Inspection:

Performed by Terry Nelson, DEQ-NRO Water Compliance on April 8, 2010 (Attachment 4).

15. Receiving Stream Water Quality and Water Quality Standards:**a) Ambient Water Quality Data**

The nearest downstream DEQ water quality monitoring station with ambient data is Station 1aCUB008.60, located on Cub Run at the Route 661 bridge crossing. Outfall 001 drains to Sand Branch. Sand Branch is a tributary to Cub Run. Outfall 002 drains to an Unnamed Tributary to Cub Run. Station 1aCUB008.60 is located in Assessment Unit VAN-A22R_CUB02A02, which extends from the confluence with an unnamed tributary to Cub Run, approximately 0.41 rivermile downstream from the confluence with Cain Branch, and continues downstream until the confluence with Flatlick Branch. Station 1aCUB008.60 is located approximately 3.5 rivermiles downstream from Outfall 001 and 4.2 rivermiles downstream from Outfall 002. The following is a monitoring summary for Assessment Unit VAN-A22R_CUB02A02 as taken from the 2008 Integrated Assessment: DEQ ambient water quality monitoring station 1aCUB008.60, at Route 661 (Old Lee Highway). Citizen monitoring station 1aCUB-CR3-SOS. Citizen monitoring finds a high probability of adverse conditions for biota, resulting in a designation of fully supporting with an observed effect for the aquatic life use. The wildlife use is considered fully supporting. The fish consumption and recreation uses were not assessed.

The full planning statement is found in Attachment 5.

b) Receiving Stream Water Quality Criteria

Part IX of 9VAC25-260(360-550) designates classes and special standards applicable to defined Virginia river basins and sections. The receiving streams, Sand Branch and UT to Cub Run, are located within Section 7a of the Potomac River Basin, and classified as a Class III water.

At all times, Class III waters must achieve a dissolved oxygen (D.O.) of 4.0 mg/L or greater, a daily average D.O. of 5.0 mg/L or greater, a temperature that does not exceed 32°C, and maintain a pH of 6.0-9.0 standard units (S.U.).

Attachment 6 details other water quality criteria applicable to the receiving stream.

Ammonia:

The fresh water, aquatic life Water Quality Criteria for Ammonia are dependent on the instream temperature and pH. A temperature value of 25°C and a pH value of 8.0 S.U. were used to calculate the ammonia water quality standards; it is staff's best professional judgment that ammonia is not expected to be present in this industrial discharge. The ammonia water quality standards calculations are shown in Attachment 6.

Metals Criteria:

There is no hardness data for this facility. Staff guidance suggests using a default hardness value of 50 mg/l CaCO₃ for streams east of the Blue Ridge. The hardness-dependent metals criteria in Attachment 6 are based on this in-stream value.

Bacteria Criteria: The Virginia Water Quality Standards (9VAC25-260-170 A.) states that the following criteria shall apply to protect primary recreational uses in surface waters:

- 1) *E. coli* bacteria per 100 ml of water shall not exceed a monthly geometric mean of the following:

	Geometric Mean ¹
Freshwater <i>E. coli</i> (N/100 ml)	126

¹For a minimum of four weekly samples [taken during any calendar month].

- c) Receiving Stream Special Standards

The State Water Control Board's Water Quality Standards, River Basin Section Tables (9VAC25-260-360, 370 and 380) designates the river basins, sections, classes, and special standards for surface waters of the Commonwealth of Virginia. The receiving streams, Sand Branch and UT to Cub Run, are located within Section 7a of the Potomac Basin. This section has been designated with a special standard of g.

Special Standard "g" refers to the Occoquan Watershed policy (9 VAC 25-410). The regulation sets stringent treatment and discharge requirements in order to improve and protect water quality, particularly since the waters are an important water supply for Northern Virginia. The regulation generally prohibits new STPs and only allows minor industrial discharges.

- d) Threatened or Endangered Species

The Virginia DGIF Fish and Wildlife Information System Database was searched on June 10, 2010, for records to determine if there are threatened or endangered species in the vicinity of the discharge. The following threatened or endangered species were identified: Upland Sandpiper and Wood Turtle. The search has been placed in the reissuance file.

16. Antidegradation (9VAC25-260-30):

All state surface waters are provided one of three levels of antidegradation protection. For Tier 1 or existing use protection, existing uses of the water body and the water quality to protect these uses must be maintained. Tier 2 water bodies have water quality that is better than the water quality standards. Significant lowering of the water quality of Tier 2 waters is not allowed without an evaluation of the economic and social impacts. Tier 3 water bodies are exceptional waters and are so designated by regulatory amendment. The antidegradation policy prohibits new or expanded discharges into exceptional waters.

The receiving streams, Sand Branch and the unnamed tributary to Cub Run have been classified as Tier 1 based on the fact that they are dry ditches transporting stormwater associated with industrial activity. There are also numerous water quality impairments: Benthic and PCB impairments in Bull Run and a Bacteria impairment for Cub Run. Permit limits proposed have been established by determining wasteload allocations which will result in attaining and/or maintaining all water quality criteria which apply to the receiving stream, including narrative criteria. These wasteload allocations will provide for the protection and maintenance of all existing uses.

17. Effluent Screening, Wasteload Allocation, and Effluent Limitation Development:

To determine water quality-based effluent limitations for a discharge, the suitability of data must first be determined. Data is suitable for analysis if one or more representative data points is equal to or above the quantification level ("QL") and the data represent the exact pollutant being evaluated.

Next, the appropriate Water Quality Standards (WQS) are determined for the pollutants in the effluent. Then, the Wasteload Allocations (WLA) are calculated. In this case since the critical flows 7Q10 and 1Q10 have been determined to be zero, the WLA's are equal to the WQS. The WLA values are then compared with available effluent data to determine the need for effluent limitations. Effluent limitations are needed if the 97th percentile of the daily

effluent concentration values is greater than the acute wasteload allocation or if the 97th percentile of the four-day average effluent concentration values is greater than the chronic wasteload allocation. Effluent limitations are based on the most limiting WLA, the required sampling frequency, and statistical characteristics of the effluent data.

a) Effluent Screening:

Effluent data obtained from the permit application and DMRs has been reviewed and determined to be suitable for evaluation. Effluent data were reviewed, and there have been no exceedances of the established limitations.

b) Mixing Zones and Wasteload Allocations (WLAs):

Wasteload allocations (WLAs) are calculated for those parameters in the effluent with the reasonable potential to cause an exceedance of water quality criteria. The basic calculation for establishing a WLA is the steady state complete mix equation:

$$WLA = \frac{C_o [Q_e + (f)(Q_s)] - [(C_s)(f)(Q_s)]}{Q_e}$$

Where:

WLA	=	Wasteload allocation
C _o	=	In-stream water quality criteria
Q _e	=	Design flow
Q _s	=	Critical receiving stream flow (1Q10 for acute aquatic life criteria; 7Q10 for chronic aquatic life criteria; harmonic mean for carcinogen-human health criteria; 30Q10 for ammonia criteria, and 30Q5 for non-carcinogen human health criteria)
f	=	Decimal fraction of critical flow
C _s	=	Mean background concentration of parameter in the receiving stream.

The water segment receiving the discharge via Outfalls 001 and 002 are considered to have a 7Q10 and 1Q10 of 0.0 MGD. As such, there is no mixing zone and the WLA is equal to the C_o.

c) Effluent Limitations Toxic Pollutants, Outfalls 001 and 002 –

9VAC25-31-220.D. requires limits be imposed where a discharge has a reasonable potential to cause or contribute to an in-stream excursion of water quality criteria. Those parameters with WLAs that are near effluent concentrations are evaluated for limits.

The VPDES Permit Regulation at 9VAC25-31-230.D. requires that monthly and weekly average limitations be imposed for continuous discharges from POTWs and monthly average and daily maximum limitations be imposed for all other continuous non-POTW discharges.

d) Effluent Limitations and Monitoring, Outfalls 001 and 002 – Conventional and Non-Conventional Pollutants

No changes to pH limitations are proposed. The pH limitations are set at the water quality criteria.

The TSS limits are based on Best Professional Judgment. Although there are no water quality standards or federal effluent guidelines for total suspended solids for the facility's industrial category, staff has determined that such limits are necessary for the protection of the receiving waters. The total suspended solids limitations are established at levels which, based on DEQ's experience with individual VPDES permits, are achievable with conventional treatment technology and which will prevent the build-up of solids on the bottoms of receiving waters.

It is imperative for the protection of water quality in the streams receiving the storm water runoff from this precast concrete operation that appropriate storm water pollution prevention controls and practices be designed and implemented. The permittee is required to demonstrate that they have implemented these

controls and practices by monitoring discharges for total petroleum hydrocarbons and total recoverable iron once every six months. These parameters have been determined to be pollutants of concern in storm water from this industrial category.

e) Effluent Limitations and Monitoring Summary.

The effluent limitations are presented in the following table. Limits were established for Flow, Total Suspended Solids, and pH. Monitoring was established for Total Petroleum Hydrocarbons and Total Recoverable Iron. Sample Type and Frequency are in accordance with the recommendations in the VPDES Permit Manual.

18. Antibacksliding:

All limits in this permit are at least as stringent as those previously established. Backsliding does not apply to this reissuance.

19. Effluent Limitations/Monitoring Requirements: 001 & 002

Effective Dates: During the period beginning with the permit's effective date and lasting until the expiration date.

PARAMETER	BASIS FOR LIMITS	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
		Monthly Average	Daily Maximum	Minimum	Maximum	Frequency	Sample Type
Flow (MGD)	NA	NL	NA	NA	NL	1/M	Estimate
TSS (mg/L)	2	30	NA	NA	60	1/M	Grab
pH (s.u.)	3	NA	NA	6.0	9.0	1/M	Grab
Total Petroleum Hydrocarbons (mg/L)*	3	NA	NA	NA	NL	1/6M	Grab
Total Recoverable Iron (mg/L)	3	NA	NA	NA	NL	1/6M	Grab

The basis for the limitations codes are: *MGD* = Million gallons per day.

1/M = Once every month.

1. Federal Effluent Requirements *NA* = Not applicable.

1/6M = Once every six months.

2. Best Professional Judgement *NL* = No limit; monitor and report.

3. Water Quality Standards *S.U.* = Standard units.

Estimate = Reported flow is to be based on the technical evaluation of the sources contributing to the discharge.

Grab = An individual sample collected over a period of time not to exceed 15-minutes.

*Total Petroleum Hydrocarbons (TPH) shall be analyzed using the Wisconsin Department of Natural Resources Modified Diesel Range Organics Method as specified in Wisconsin publication SW-141 (1995), or by EPA SW-846 Method 8015C for diesel range organics, or by EPA SW-846 Method 8270D. If Method 8270D is used, the lab must report the combination of diesel range organics and polynuclear aromatic hydrocarbons.

The semiannual monitoring periods shall be January through June and July through December. The DMR shall be submitted no later than the 10th day of the month following the monitoring period.

20. Other Permit Requirements:

- a) Part I.B. of the permit contains quantification levels and compliance reporting instructions. 9VAC25-31-190.L.4.c. requires an arithmetic mean for measurement averaging and 9VAC25-31-220.D. requires limits be imposed where a discharge has a reasonable potential to cause or contribute to an in-stream excursion of water quality criteria. Specific analytical methodologies for toxics are listed in this permit section as well as quantification levels (QLs) necessary to demonstrate compliance with applicable permit limitations or for use in future evaluations to determine if the pollutant has reasonable potential to cause or contribute to a violation. Required averaging methodologies are also specified.

21. Other Special Conditions:

- a) Notification Levels The permittee shall notify the Department as soon as they know or have reason to believe:
- a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:
 - (1) One hundred micrograms per liter;
 - (2) Two hundred micrograms per liter for acrolein and acrylonitrile; five hundred micrograms per liter for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter for antimony;
 - (3) Five times the maximum concentration value reported for that pollutant in the permit application; or
 - (4) The level established by the Board.
 - b. That any activity has occurred or will occur which would result in any discharge, on a nonroutine or infrequent basis, of a toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:
 - (1) Five hundred micrograms per liter;
 - (2) One milligram per liter for antimony;
 - (3) Ten times the maximum concentration value reported for that pollutant in the permit application; or
 - (4) The level established by the Board.
- b) Materials Handling/Storage. 9VAC25-31-50 A prohibits the discharge of any wastes into State waters unless authorized by permit. Code of Virginia §62.1-44.16 and §62.1-44.17 authorize the Board to regulate the discharge of industrial waste or other waste.
- c) O&M Manual Requirement. Required by Code of Virginia §62.1-44.19; VPDES Permit Regulation, 9VAC25-31-190.E. Within 90 days of the effective date of this permit, the permittee shall submit for approval an Operations and Maintenance (O&M) Manual or a statement confirming the accuracy and completeness of the current O&M Manual to the Department of Environmental Quality, Northern Regional Office (DEQ-NRO). Future changes to the facility must be addressed by the submittal of a revised O&M Manual within 90 days of the changes. Non-compliance with the O&M Manual shall be deemed a violation of the permit.
- d) Water Quality Criteria Reopener. The VPDES Permit Regulation at 9VAC25-31-220 D. requires establishment of effluent limitations to ensure attainment/maintenance of receiving stream water quality criteria. Should effluent monitoring indicate the need for any water quality-based limitations, this permit may be modified or alternatively revoked and reissued to incorporate appropriate limitations.
- e) Reuse of Treated Wastewater for Dust Control. In order to ensure that reuse of treated wastewater on site for the purposes of dust suppression is managed properly and no ponding or surface runoff will occur as a result of such activity.
- f) Restrictions of Waste Concrete Reclamation. Waste concrete that returns to the plant is either reclaimed at the truck washing facility or it is dumped on the plant site for drying and later reclamation for off-site fill or road base. The permit restricts this practice to a designated area and prohibits any untreated discharge from it to surface waters.

- g) Vehicle and Equipment Maintenance. Vehicles and equipment used in the industrial activity are to be operated and maintained in a manner that prevents pollution of surface or ground waters. This special condition addresses best management practices for activities associated with vehicle maintenance that take place at a typical ready-mixed concrete facility.
- h) Wastewater Collection Requirement. Wastewater collected in basins at the concrete batch plant, panel washing, and equipment washdown areas will be recycled into the process. There will be no discharge of process wastewater. A minimum freeboard of one foot for the treatment/storage system is required to be maintained and is considered as best management practice.
- i) Washing Activities. All truck and product mixing unit washing is restricted to the designated washdown and washout areas. There shall be no discharge of wastewater from these activities. Wastewater generated in this area is to be recycled or treated prior to discharge. The storage of raw materials and washing of trucks and other mixing equipment shall be handled in a way that provides for treatment of any wastewater prior to discharge.

Permit Section Part II. 9VAC25-193-10 et seq. defines discharges of process and storm water from concrete products facilities. The Pollution Prevention Plan requirements are derived from the VPDES general permit for discharges of storm water associated with industrial activity, 9 VAC 25-151-10 et seq., but are applicable to managing stormwater from a concrete products facility such as Adaptive Concrete.

The plan is intended to identify potential sources of pollution which may reasonably be expected to affect the quality of storm water discharges and the plan will describe and ensure the implementation of practices which will be used to reduce the pollutants in storm water discharges. The Clean Water Act (CWA) requires that all NPDES permits for storm water discharges associated with industrial activity must, at a minimum, establish Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) requirements. This permit establishes BAT/BCT requirements in terms of requirements to develop and implement storm water pollution prevention plans and thus, is consistent with the requirements of the CWA.

Permit Section Part III. Part III of the permit contains standard conditions that appear in all VPDES Permits. In general, these standard conditions address the responsibilities of the permittee, reporting requirements, testing procedures and records retention.

23. Changes to the Permit from the Previously Issued Permit:

- a) Special Conditions:
No changes are proposed.
- b) Monitoring and Effluent Limitations:
No changes are proposed.

24. Variances/Alternate Limits or Conditions:

None

25. Public Notice Information:

First Public Notice Date: 11/24/2010

Second Public Notice Date: 12/1/2010

Public Notice Information is required by 9VAC25-31-280 B. All pertinent information is on file and may be inspected, and copied by contacting the: DEQ Northern Regional Office, 13901 Crown Court, Woodbridge, VA 22193, Telephone No. (703) 583-3834, Alison.Thompson@deq.virginia.gov. See Attachment 7 for a copy of the public notice document.

Persons may comment in writing or by email to the DEQ on the proposed permit action, and may request a public hearing, during the comment period. Comments shall include the name, address, and telephone number of the writer and of all persons represented by the commenter/requester, and shall contain a complete, concise statement of the factual basis for comments. Only those comments received within this period will be considered. The DEQ may decide to hold a public hearing, including another comment period, if public response is significant and there are substantial, disputed issues relevant to the permit. Requests for public hearings shall state 1) the reason why a hearing is requested; 2) a brief, informal statement regarding the nature and extent of the interest of the requester or of those represented by the requester, including how and to what extent such interest would be directly and adversely affected by the permit; and 3) specific references, where possible, to terms and conditions of the permit with suggested revisions. Following the comment period, the Board will make a determination regarding the proposed permit action. This determination will become effective, unless the DEQ grants a public hearing. Due notice of any public hearing will be given. The public may request an electronic copy of the draft permit and fact sheet or review the draft permit and application at the DEQ Northern Regional Office by appointment.

26. 303 (d) Listed Stream Segments and Total Max. Daily Loads (TMDL):

Cub Run Bacteria TMDL – The bacteria TMDL for Cub Run is scheduled to be completed by 2018. However, with the approval of the 2010 Assessment, a TMDL will not be required for this impaired segment because it is “nested” within the completed bacteria TMDL for Bull Run (EPA Approved 11/15/2006). The bacteria sources in this impaired segment were already taken into account during the development of the Bull Run Bacteria TMDL. Bacteria is not a parameter of concern from this facility, so it did not receive an allocation.

Bull Run Benthic TMDL – EPA approved this TMDL on 09/26/2006. While the Bull Run Benthic TMDL did list VA0090441 in the TMDL, it did not assign it a WLA. Because the facility discharges TSS, TMDL staff believes that the TMDL should have assigned this facility a WLA. In light of that, a WLA of **0.5 tons/year of sediment** has been established for VA0090441. The calculation of the yearly load is found in the reissuance file. The Bull Run Benthic TMDL included an allocation for the future growth and expansion of point sources in the watershed. The future growth allocation is more than enough to account for the WLA for this facility.

Bull Run PCB TMDL – The TMDL is not scheduled for completion until 2016.

TMDL Reopener: This special condition is to allow the permit to reopened if necessary to bring it in compliance with any applicable TMDL that may be developed and approved for the receiving stream.

27. Additional Comments:

Previous Board Action: This facility had a Consent Special Order during the last permit reissuance. The facility was issued Notice of Violation #W2004-09-N-0016 for pH exceedances. The facility was referred to DEQ’s enforcement staff for further action. Adaptive Concrete Solutions worked with DEQ’s enforcement staff to update the Stormwater Pollution Prevention Plan and to install a pH adjustment system for Outfall 001.

Staff Comments: None.

Public Comment: None.

EPA Checklist: The checklist can be found in Attachment 8.

Attachments to the Fact Sheet for Adaptive Concrete Solutions – VA0090441

- Attachment 1 - Flow Frequency Determination
- Attachment 2 - NPDES Industrial Rating Worksheet
- Attachment 3 - Topographic Map
- Attachment 4 - Site Inspection April 8, 2010 and chemical storage
- Attachment 5 - Planning Statement
- Attachment 6 - MSTRANTI (Water Quality Criteria and Wasteload Allocations)
- Attachment 7 - Public Notice
- Attachment 8 - EPA Checklist

From: Kenneth H. Hegett@WDBRG@DEQ
Cc: Paul E. Hegett@WQA@DEQ
Subject: Concrete Placement Systems, Inc.
Attachment:
Date: 3/6/2000 3:51 PM

Kenneth,

The Concrete Placement Systems, Inc. (former site of DuBrook Concrete, Inc.) discharges via two outfalls on the Sand Branch near Dulles International Airport. Flow frequencies are required at these sites for use by the permit writer in developing effluent limitations for the VPDES permit.

The values for each discharge point were determined by inspection of the USGS Herndon Quadrangle topographical map. The map depicts the receiving stream as intermittent at each outfall site. The flow frequencies for intermittent streams are 0.0 cfs for the 1Q10, 7Q10, 30Q5, high flow 1Q10, high flow 7Q10, and the harmonic mean.

If you have any questions concerning this analysis, please let me know.

NPDES PERMIT RATING WORK SHEET

VPDES NO. : VA0090441

- ☒ Regular Addition
☐ Discretionary Addition
☐ Score change, but no status Change
☐ Deletion

Facility Name: Advanced Concrete Solutions

City / County: Loudoun County

Receiving Water: Sand Branch, UT to Cub Run

Reach Number: VAN-A22R

Is this facility a steam electric power plant (sic =4911) with one or more of the following characteristics?

1. Power output 500 MW or greater (not using a cooling pond/lake)

2. A nuclear power Plant

3. Cooling water discharge greater than 25% of the receiving stream's 7Q10 flow rater

Is this permit for a municipal separate storm sewer serving a population greater than 100,000?

☐ YES; score is 700 (stop here)☒ NO; (continue)☐ Yes; score is 600 (stop here) ☒ NO; (continue)

FACTOR 1: Toxic Pollutant Potential

PCS SIC Code: Primary Sic Code: 3273 Other Sic Codes:

Industrial Subcategory Code: 99 (Code 000 if no subcategory)

Determine the Toxicity potential from Appendix A. Be sure to use the TOTAL toxicity potential column and check one)

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
<input checked="" type="checkbox"/> No process waste streams	0	0	<input type="checkbox"/> 3.	3	15	<input type="checkbox"/> 7.	7	35
<input type="checkbox"/> 1.	1	5	<input type="checkbox"/> 4.	4	20	<input type="checkbox"/> 8.	8	40
<input type="checkbox"/> 2.	2	10	<input type="checkbox"/> 5.	5	25	<input type="checkbox"/> 9.	9	45
			<input type="checkbox"/> 6.	6	30	<input type="checkbox"/> 10.	10	50

Code Number Checked: 0

Total Points Factor 1: 0

FACTOR 2: Flow/Stream Flow Volume (Complete either Section A or Section B; check only one)

Section A – Wastewater Flow Only considered

Wastewater Type (see Instructions)	Code	Points
Type I: Flow < 5 MGD	<input type="checkbox"/> 11	0
Flow 5 to 10 MGD	<input type="checkbox"/> 12	10
Flow > 10 to 50 MGD	<input type="checkbox"/> 13	20
Flow > 50 MGD	<input type="checkbox"/> 14	30
Type II: Flow < 1 MGD	<input type="checkbox"/> 21	10
Flow 1 to 5 MGD	<input type="checkbox"/> 22	20
Flow > 5 to 10 MGD	<input type="checkbox"/> 23	30
Flow > 10 MGD	<input type="checkbox"/> 24	50
Type III: Flow < 1 MGD	<input type="checkbox"/> 31	0
Flow 1 to 5 MGD	<input type="checkbox"/> 32	10
Flow > 5 to 10 MGD	<input type="checkbox"/> 33	20
Flow > 10 MGD	<input type="checkbox"/> 34	30

Section B – Wastewater and Stream Flow Considered

Wastewater Type (see Instructions)	Percent of Instream Wastewater Concentration at Receiving Stream Low Flow	Code	Points
Type I/II:	< 10 %	<input type="checkbox"/> 41	0
	10 % to < 50 %	<input type="checkbox"/> 42	10
	> 50%	<input type="checkbox"/> 43	20
Type II:	< 10 %	<input type="checkbox"/> 51	0
	10 % to < 50 %	<input type="checkbox"/> 52	20
	> 50 %	<input checked="" type="checkbox"/> 53	30

Code Checked from Section A or B: 53

Total Points Factor 2: 30

NPDES PERMIT RATING WORK SHEET

FACTOR 3: Conventional Pollutants

(only when limited by the permit)

A. Oxygen Demanding Pollutants: (check one)

☐

BOD

☐

COD

☐

Other: _____

Permit Limits: (check one)

☐
☐
☐
☐< 100 lbs/day
100 to 1000 lbs/day
> 1000 to 3000 lbs/day
> 3000 lbs/day

Code

1
2
3
4

Points

0
5
15
20

Code Number Checked: NA

Points Scored: 0

B. Total Suspended Solids (TSS)

Permit Limits: (check one)

☒
☐
☐
☐< 100 lbs/day
100 to 1000 lbs/day
> 1000 to 5000 lbs/day
> 5000 lbs/day

Code

1
2
3
4

Points

0
5
15
20

Code Number Checked: 1

Points Scored: 0

C. Nitrogen Pollutants: (check one)

☐

Ammonia

☐

Other: _____

Permit Limits: (check one)

☐
☐
☐
☐

Nitrogen Equivalent

< 300 lbs/day
300 to 1000 lbs/day
> 1000 to 3000 lbs/day
> 3000 lbs/day

Code

1
2
3
4

Points

0
5
15
20

Code Number Checked: NA

Points Scored: 0**Total Points Factor 3: 0****FACTOR 4: Public Health Impact**

Is there a public drinking water supply located within 50 miles downstream of the effluent discharge (this include any body of water to which the receiving water is a tributary)? A public drinking water supply may include infiltration galleries, or other methods of conveyance that ultimately get water from the above reference supply.

☐ YES; (If yes, check toxicity potential number below)☒ NO; (If no, go to Factor 5)

Determine the *Human Health* potential from Appendix A. Use the same SIC doe and subcategory reference as in Factor 1. (Be sure to use the *Human Health* toxicity group column – check one below)

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
<input type="checkbox"/> No process waste streams	0	0	<input type="checkbox"/> 3.	3	0	<input type="checkbox"/> 7.	7	15
<input type="checkbox"/> 1.	1	0	<input type="checkbox"/> 4.	4	0	<input type="checkbox"/> 8.	8	20
<input type="checkbox"/> 2.	2	0	<input type="checkbox"/> 5.	5	5	<input type="checkbox"/> 9.	9	25
			<input type="checkbox"/> 6.	6	10	<input type="checkbox"/> 10.	10	30

Code Number Checked: NA

Total Points Factor 4: 0

NPDES PERMIT RATING WORK SHEET

FACTOR 5: Water Quality Factors

- A. Is (or will) one or more of the effluent discharge limits based on water quality factors of the receiving stream (rather than technology-base federal effluent guidelines, or technology-base state effluent guidelines), or has a wasteload allocation been to the discharge

	Code	Points
<input type="checkbox"/> YES	1	10
<input checked="" type="checkbox"/> NO	2	0

- B. Is the receiving water in compliance with applicable water quality standards for pollutants that are water quality limited in the permit?

	Code	Points
<input checked="" type="checkbox"/> YES	1	0
<input type="checkbox"/> NO	2	5

- C. Does the effluent discharged from this facility exhibit the reasonable potential to violate water quality standards due to whole effluent toxicity?

	Code	Points
<input type="checkbox"/> YES	1	10
<input checked="" type="checkbox"/> NO	2	0

Code Number Checked: A 2 + B 1 + C 2
Points Factor 5: A 0 + B 0 + C 0 = 0

FACTOR 6: Proximity to Near Coastal Waters

- A. Base Score: Enter flow code here (from factor 2) 53

Check appropriate facility HPRI code (from PCS):

HPRI#	Code	HPRI Score
<input type="checkbox"/> 1	1	20
<input type="checkbox"/> 2	2	0
<input type="checkbox"/> 3	3	30
<input checked="" type="checkbox"/> 4	4	0
<input type="checkbox"/> 5	5	20

HPRI code checked : 4

Base Score (HPRI Score): 0 X (Multiplication Factor) 0.6 = 0

Enter the multiplication factor that corresponds to the flow code: 0.6

Flow Code	Multiplication Factor
11, 31, or 41	0.00
12, 32, or 42	0.05
13, 33, or 43	0.10
14 or 34	0.15
21 or 51	0.10
22 or 52	0.30
23 or 53	0.60
24	1.00

- B. Additional Points – NEP Program

For a facility that has an HPRI code of 3, does the facility discharge to one of the estuaries enrolled in the National Estuary Protection (NEP) program (see instructions) or the Chesapeake Bay?

Code	Points
<input type="checkbox"/> 1	10
<input checked="" type="checkbox"/> 2	0

- C. Additional Points – Great Lakes Area of Concern

For a facility that has an HPRI code of 5, does the facility discharge any of the pollutants of concern into one of the Great Lakes' 31 area's of concern (see instructions)?

Code	Points
<input type="checkbox"/> 1	10
<input checked="" type="checkbox"/> 2	0

Code Number Checked: A 4 + B 2 + C 2
Points Factor 6: A 0 + B 0 + C 0 = 0

NPDES PERMIT RATING WORK SHEET

SCORE SUMMARY

<u>Factor</u>	<u>Description</u>	<u>Total Points</u>
1	Toxic Pollutant Potential	0
2	Flows / Streamflow Volume	30
3	Conventional Pollutants	0
4	Public Health Impacts	0
5	Water Quality Factors	0
6	Proximity to Near Coastal Waters	0
TOTAL (Factors 1 through 6)		30

S1. Is the total score equal to or greater than 80 ☐ YES; (Facility is a Major) ☒ NO

S2. If the answer to the above questions is no, would you like this facility to be discretionary major?

☒ NO

☐ YES; (Add 500 points to the above score and provide reason below:

Reason:

NEW SCORE : 30
OLD SCORE : 30

Permit Reviewer's Name : Alison Thompson
Phone Number: (703)583-3834
Date: 8/13/2010

This is a detailed topographic map of the Herndon, Virginia area, centered around Dulles International Airport. The map features contour lines indicating elevation, with labels such as 310, 320, 330, 340, 350, 360, 370, 380, 390, 400, 410, 420, 430, 440, 450, 460, 470, 480, 490, 500, 510, 520, 530, 540, 550, 560, 570, 580, 590, 600, 610, 620, 630, 640, 650, 660, 670, 680, 690, 700, 710, 720, 730, 740, 750, 760, 770, 780, 790, 800, 810, 820, 830, 840, 850, 860, 870, 880, 890, 900, 910, 920, 930, 940, 950, 960, 970, 980, 990, 1000, 1010, 1020, 1030, 1040, 1050, 1060, 1070, 1080, 1090, 1100, 1110, 1120, 1130, 1140, 1150, 1160, 1170, 1180, 1190, 1200, 1210, 1220, 1230, 1240, 1250, 1260, 1270, 1280, 1290, 1300, 1310, 1320, 1330, 1340, 1350, 1360, 1370, 1380, 1390, 1400, 1410, 1420, 1430, 1440, 1450, 1460, 1470, 1480, 1490, 1500, 1510, 1520, 1530, 1540, 1550, 1560, 1570, 1580, 1590, 1600, 1610, 1620, 1630, 1640, 1650, 1660, 1670, 1680, 1690, 1700, 1710, 1720, 1730, 1740, 1750, 1760, 1770, 1780, 1790, 1800, 1810, 1820, 1830, 1840, 1850, 1860, 1870, 1880, 1890, 1900, 1910, 1920, 1930, 1940, 1950, 1960, 1970, 1980, 1990, 2000, 2010, 2020, 2030, 2040, 2050, 2060, 2070, 2080, 2090, 2100, 2110, 2120, 2130, 2140, 2150, 2160, 2170, 2180, 2190, 2200, 2210, 2220, 2230, 2240, 2250, 2260, 2270, 2280, 2290, 2300, 2310, 2320, 2330, 2340, 2350, 2360, 2370, 2380, 2390, 2400, 2410, 2420, 2430, 2440, 2450, 2460, 2470, 2480, 2490, 2500, 2510, 2520, 2530, 2540, 2550, 2560, 2570, 2580, 2590, 2600, 2610, 2620, 2630, 2640, 2650, 2660, 2670, 2680, 2690, 2700, 2710, 2720, 2730, 2740, 2750, 2760, 2770, 2780, 2790, 2800, 2810, 2820, 2830, 2840, 2850, 2860, 2870, 2880, 2890, 2900, 2910, 2920, 2930, 2940, 2950, 2960, 2970, 2980, 2990, 3000, 3010, 3020, 3030, 3040, 3050, 3060, 3070, 3080, 3090, 3100, 3110, 3120, 3130, 3140, 3150, 3160, 3170, 3180, 3190, 3200, 3210, 3220, 3230, 3240, 3250, 3260, 3270, 3280, 3290, 3300, 3310, 3320, 3330, 3340, 3350, 3360, 3370, 3380, 3390, 3400, 3410, 3420, 3430, 3440, 3450, 3460, 3470, 3480, 3490, 3500, 3510, 3520, 3530, 3540, 3550, 3560, 3570, 3580, 3590, 3600, 3610, 3620, 3630, 3640, 3650, 3660, 3670, 3680, 3690, 3700, 3710, 3720, 3730, 3740, 3750, 3760, 3770, 3780, 3790, 3800, 3810, 3820, 3830, 3840, 3850, 3860, 3870, 3880, 3890, 3900, 3910, 3920, 3930, 3940, 3950, 3960, 3970, 3980, 3990, 4000, 4010, 4020, 4030, 4040, 4050, 4060, 4070, 4080, 4090, 4100, 4110, 4120, 4130, 4140, 4150, 4160, 4170, 4180, 4190, 4200, 4210, 4220, 4230, 4240, 4250, 4260, 4270, 4280, 4290, 4300, 4310, 4320, 4330, 4340, 4350, 4360, 4370, 4380, 4390, 4400, 4410, 4420, 4430, 4440, 4450, 4460, 4470, 4480, 4490, 4500, 4510, 4520, 4530, 4540, 4550, 4560, 4570, 4580, 4590, 4600, 4610, 4620, 4630, 4640, 4650, 4660, 4670, 4680, 4690, 4700, 4710, 4720, 4730, 4740, 4750, 4760, 4770, 4780, 4790, 4800, 4810, 4820, 4830, 4840, 4850, 4860, 4870, 4880, 4890, 4900, 4910, 4920, 4930, 4940, 4950, 4960, 4970, 4980, 4990, 5000, 5010, 5020, 5030, 5040, 5050, 5060, 5070, 5080, 5090, 5100, 5110, 5120, 5130, 5140, 5150, 5160, 5170, 5180, 5190, 5200, 5210, 5220, 5230, 5240, 5250, 5260, 5270, 5280, 5290, 5300, 5310, 5320, 5330, 5340, 5350, 5360, 5370, 5380, 5390, 5400, 5410, 5420, 5430, 5440, 5450, 5460, 5470, 5480, 5490, 5500, 5510, 5520, 5530, 5540, 5550, 5560, 5570, 5580, 5590, 5600, 5610, 5620, 5630, 5640, 5650, 5660, 5670, 5680, 5690, 5700, 5710, 5720, 5730, 5740, 5750, 5760, 5770, 5780, 5790, 5800, 5810, 5820, 5830, 5840, 5850, 5860, 5870, 5880, 5890, 5900, 5910, 5920, 5930, 5940, 5950, 5960, 5970, 5980, 5990, 6000, 6010, 6020, 6030, 6040, 6050, 6060, 6070, 6080, 6090, 6100, 6110, 6120, 6130, 6140, 6150, 6160, 6170, 6180, 6190, 6200, 6210, 6220, 6230, 6240, 6250, 6260, 6270, 6280, 6290, 6300, 6310, 6320, 6330, 6340, 6350, 6360, 6370, 6380, 6390, 6400, 6410, 6420, 6430, 6440, 6450, 6460, 6470, 6480, 6490, 6500, 6510, 6520, 6530, 6540, 6550, 6560, 6570, 6580, 6590, 6600, 6610, 6620, 6630, 6640, 6650, 6660, 6670, 6680, 6690, 6700, 6710, 6720, 6730, 6740, 6750, 6760, 6770, 6780, 6790, 6800, 6810, 6820, 6830, 6840, 6850, 6860, 6870, 6880, 6890, 6900, 6910, 6920, 6930, 6940, 6950, 6960, 6970, 6980, 6990, 7000, 7010, 7020, 7030, 7040, 7050, 7060, 7070, 7080, 7090, 7100, 7110

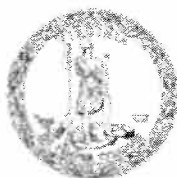
● VA0090441 Outfalls

0 0.25 0.5 1 Miles

Appendix to VPDES Permit VA 0090441 Application, Adaptive Concrete Solutions

Chemicals Stored Onsite

Material	Description	Maximum Volume Stored
Viscocrete 6100	High Range Water Reducer	500 Gal
Plastocrete 161 FL	Non-Chloride Accelerator	1500 Gal
Sikament 86	High Range Water Reducer	1000 Gal
Plastiment	Water Reducer and Retarder	500 Gal
Sikarapid	Non-Chloride Accelerator	500 Gal
Sikament MP	Multi Purpose Water Reducer	500 Gal
Sika AEA15	Air Entraining Agent	500 Gal
Muratic Acid	Water Treatment 10 gal Drums	



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

Douglas W. Domenech
Secretary of Natural Resources

13901 Crown Court, Woodbridge, Virginia 22193
(703) 583-3800 Fax (703) 583-3821
www.deq.virginia.gov

David K. Paylor
Director

Thomas A. Faha
Regional Director

April 21, 2010

Mr. Mel Howard
DuBrook Concrete
4215 Lafayette Center Drive, Suite 1
Chantilly, VA 20151

Re: **DuBrook Concrete, Permit VAG110094**
Adaptive Concrete, Permit VA0090441

Dear Mr. Howard:

Attached is a copy of the Site Inspection Report generated from the Site Inspection conducted at the Dubrook Concrete and Adaptive Concrete facilities on April 8, 2010.

Based on conditions observed during the site visit, waste concrete products are not being handled in accordance with permit conditions. **A written response concerning the items listed in the Required Corrective Actions section is due to this office by May 12, 2010.** Included in this response should be a plan of action and timetable for resolving these compliance issues, if they have not already been addressed. Your response may be sent either via the US Postal Service or electronically, via E-mail. DEQ recommends sending electronic responses as an Acrobat PDF or in a Word-compatible, write-protected format. Additional inspections may be conducted to confirm the facility is in compliance with permit requirements.

If you have any questions or comments concerning this report, please feel free to contact me at the Northern Regional Office at (703) 583-3833 or by e-mail at terry.nelson@deq.virginia.gov.

Sincerely,


A handwritten signature in cursive script that reads "Terry Nelson".

Terry Nelson
Environmental Specialist II

cc: Permits / DMR File
Electronic Copy: Compliance Manager; Compliance Auditor

Virginia Department of Environmental Quality
Northern Regional Office

RECON INSPECTION REPORT

FACILITY NAME: Adaptive Concrete DuBrook Concrete		INSPECTION DATE: April 8, 2010	
PERMIT No.: VA0090441 VAG110094		INSPECTOR Terry Nelson	
TYPE OF FACILITY: <input type="checkbox"/> Municipal <input type="checkbox"/> Major <input checked="" type="checkbox"/> Industrial <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Federal <input type="checkbox"/> Small Minor <input type="checkbox"/> HP <input type="checkbox"/> LP		TIME OF INSPECTION:	Arrival 1230
		TOTAL TIME SPENT (including prep & travel)	Departure 1330 6 hours
PHOTOGRAPHS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		UNANNOUNCED INSPECTION? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
REVIEWED BY / Date:  4/21/10			
PRESENT DURING INSPECTION: Troy King			

INSPECTION OVERVIEW AND CONDITION OF TREATMENT UNITS

- Weather conditions were sunny, warm, low 70's.
- On April 6, 2010; DEQ NRO staff was at Dulles Airport when the airport staff showed them what appeared to be solids entering airport property from the DuBrook/Adaptive property.
- Photographs from April 6, 2010 are included in this report.
- On April 8, 2010; DEQ NRO staff conducted a follow-up visit to the DuBrook Concrete and Adaptive Concrete property.
- DEQ staff parked near the Adaptive Concrete building and walked around the site.
- No activity was observed inside the building or the outside areas used by Adaptive Concrete for precast concrete activities.
- The building appeared to be used for covered parking of several DuBrook trucks.
- Stormwater pond 2 is located near the property line with Loudoun Composting. The pond contained a small quantity of clear water.
- The pond where process water was stored prior to pH adjustment also contained a small quantity of clear water.
- Numerous piles of crushed concrete were observed scattered around this site.
- A medium size loader was observed moving dirt, brush, and concrete debris into several piles.
- A large loader appeared to be moving crushed concrete from this site to another waste storage area across the creek.
- Along the west edge of the property, DEQ staff observed a low spot that had accumulated water.
- This low spot is shown in the attached photographs.
- The land between this pool and the property line appeared to have concrete solids that had been washed out of this pool.
- As DEQ staff walked from this pool toward the manufacturing area, they observed solids that began at a concrete block wall and proceeded under the property line fence onto airport property.
- Multiple warning signs were observed stating the land beyond the fence was airport property.
- Several padlocked gates with jersey barriers were also observed.

INSPECTION OVERVIEW AND CONDITION OF TREATMENT UNITS

- The solids appeared to come from a large pile of crushed material which started at the concrete block wall and extended about 10 feet out. The top of the concrete blocks were covered with crushed material.
- The concrete block wall was about 10 feet from the fence line.
- DEQ staff was not able to walk behind the concrete block wall as the ground was slippery.
- DEQ staff walked around the pile and found the pile started near an entrance gate with a sign designating gate 311.
- Thick pine trees prevented DEQ staff from walking behind the pile starting from gate 311.
- DEQ walked from this area to the main concrete waste storage area.
- This area is on the other side of Sand Branch.
- As DEQ staff crossed the creek, they noticed a small pile of crushed waste concrete to their right.
- The pile appeared smaller than the pile in historical DEQ photographs.
- The crushed material is piled up against the concrete barriers and in places is very close to flowing over the top of the barrier.
- The larger waste material pile is to the left when crossing the creek. The path through the pile had sufficient width for mixer trucks.
- No new material was observed near the front edges of the pile.
- This pile forms a continuous giant U.
- As DEQ staff walked along the top of the pile, they observed recent piles of hardened waste concrete and waste from truck washout about 2/3 of the way down the right side of the U shaped pile.
- A trail of hardened water/cement slurry was observed going down the front and back of the pile.
- The hardened slurry reached the base of the back side of the slope and was in contact with standing water.
- DEQ staff could not determine if the water was a tributary to Sand Branch or a stormwater pool.
- Near the back of the pile, DEQ staff observed more fresh waste material and washout slurry headed both ways down the slope.
- Hardened waste material had flowed to the base of the slope and had reached Sand Branch.
- DEQ staff drove to the Dubrook Concrete office. DEQ staff asked an employee if Mr. King was available.
- The employee called Mr. King who was driving around the site.
- Mr. King discussed the observations with DEQ staff.
- While they were talking, a mixer truck began discharging wash out materials.
- Based on the chute angle, truck location, and discharge rate; DEQ staff has reason to believe the water was probably flowing in both directions.
- Mr. King said he would confirm where the water was going and take appropriate steps to prevent further discharge from reaching Sand Branch.

EFFLUENT FIELD DATA:

Flow	MGD	Dissolved Oxygen	mg/L	TRC (Contact Tank)	mg/L
pH	S.U.	Temperature	°C	TRC (Final Effluent)	mg/L
Was a Sampling Inspection conducted? <input type="checkbox"/> Yes (see Sampling Inspection Report) <input checked="" type="checkbox"/> No					

CONDITION OF OUTFALL AND EFFLUENT CHARACTERISTICS:

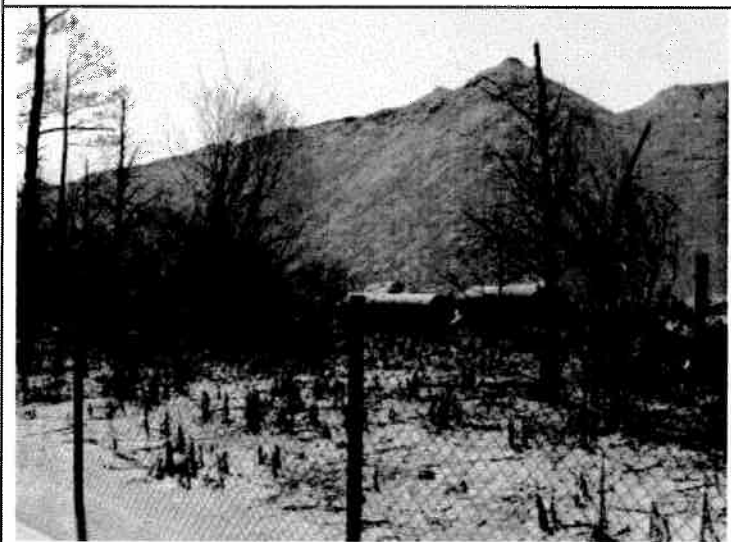
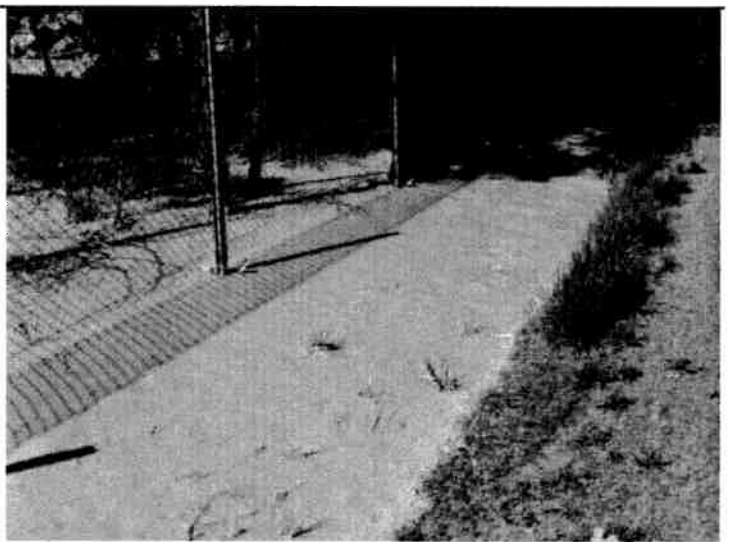
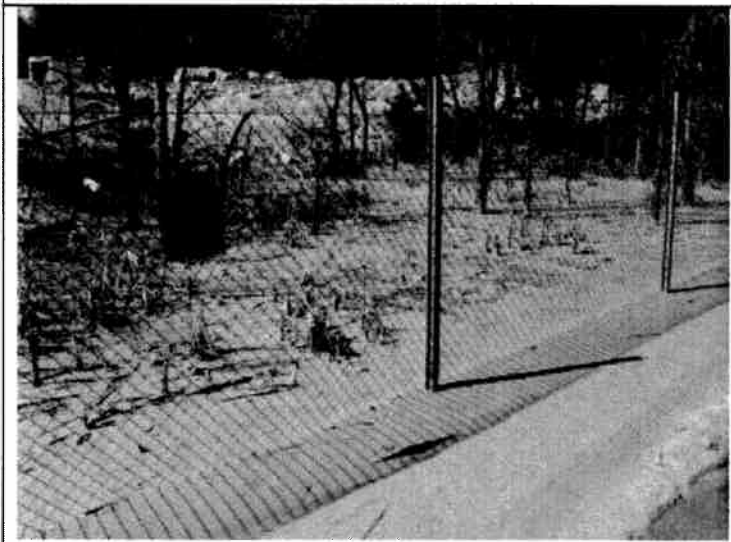
1. Type of outfall:	<input type="checkbox"/> Shore based	<input type="checkbox"/> Submerged	Diffuser?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2. Are the outfall and supporting structures in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No				
3. Final Effluent (evidence of following problems):	<input type="checkbox"/> Sludge bar <input type="checkbox"/> Grease <input type="checkbox"/> Turbid effluent <input type="checkbox"/> Visible foam <input type="checkbox"/> Unusual color <input type="checkbox"/> Oil sheen				
4. Is there a visible effluent plume in the receiving stream?	<input type="checkbox"/> Yes <input type="checkbox"/> No				
5. Receiving stream:	<input type="checkbox"/> No observed problems <input type="checkbox"/> Indication of problems (explain below) <u>Comments:</u> Outfalls were not observed during site visit				

REQUIRED CORRECTIVE ACTIONS:

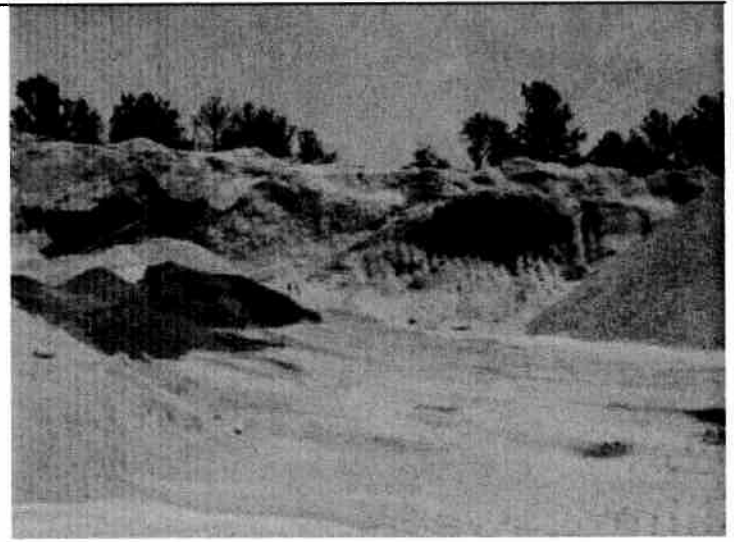
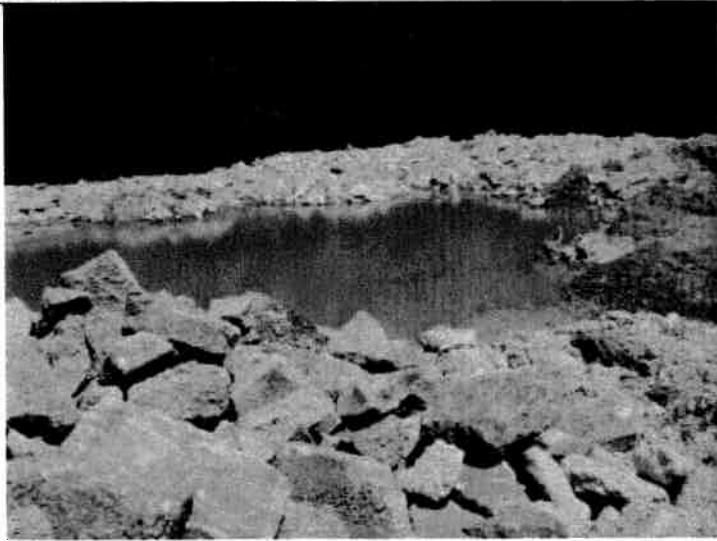
<p>1. Permit VA0090441, Part I, Page 4, Section C, Number 3, Materials Handling/Storage, states, "Any and all product, materials, industrial wastes, and/or other wastes resulting from the purchase, sale, mining, extraction, transport, preparation, and/or storage of raw or intermediate materials, final product, by product or wastes, shall be handled, disposed of, and/or stored in such a manner so as not to permit a discharge of such product, materials, industrial wastes, and/or other wastes to State waters, except as expressly authorized." The transport of solids onto Dulles Airport property is in violation of this permit condition.</p> <p>2. Permit VAG110094, Part I, Page 5, Section B, Number 2 states, "Except as expressly authorized by this permit, no product, materials, industrial wastes, or other wastes resulting from the purchase, sale, mining, extraction, transport, preparation, or storage of raw or intermediate materials, final product, byproduct or wastes, shall be handled, disposed of, or stored so as to permit a discharge of such product, materials, industrial wastes, or other wastes to surface waters." The presence of waste concrete in Sand Branch and its tributaries is violation of this permit condition.</p>
--

NOTES and COMMENTS:

--



Photographs taken on 04-06-10 from Dulles Airport Property



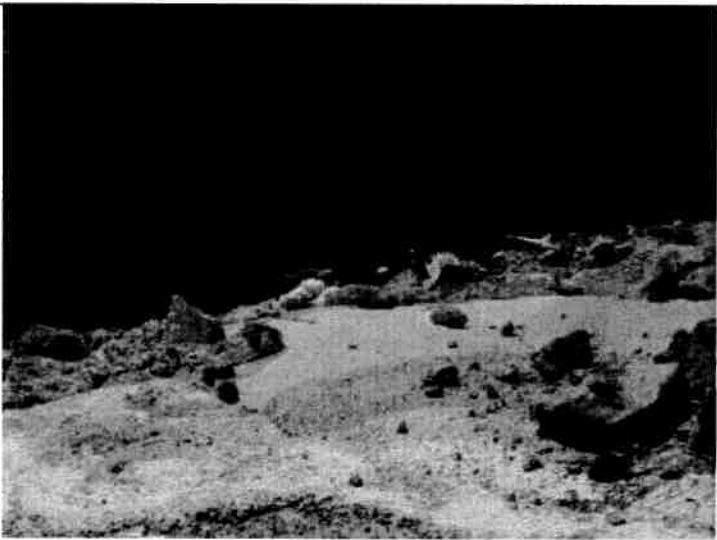
Photographs from 04-08-10 from Adaptive Concrete property that is adjacent to Dulles Airport property. The pool in the first photo could be carrying solids off-site.



Waste concrete area where trucks discharge.



Hardened material that flowed down the pile to the ground and collected water.



Recently poured material at the top of the pile.



Hardened material observed in water channel.

Photographs from 04-8-10 of waste area across the creek from Dubrook Concrete

To: Alison Thompson
From: Katie Conaway

Date: July 23, 2010
Subject: Planning Statement for Adaptive Concrete Solutions
Permit Number: VA0090441

Discharge Type: Industrial
Discharge Flow: Varies, Stormwater

Outfall 001:

Receiving Stream: Sand Branch
River Mile: 0.78
Latitude / Longitude: 38.55.15 / 77.28.30 (Outfall 001), 38.55.40 / 77.28.30 (Outfall 002)
Waterbody ID: A22R, PL45
Water Quality Standards: Class III, Section 7a, Special Standards g

Outfall 002:

Receiving Stream: UT to Cub Run
River Mile: 0.48
Latitude / Longitude: 38.55.40 / 77.28.30
Waterbody ID: A22R, PL45
Water Quality Standards: Class III, Section 7a, Special Standards g

1. Is there monitoring data for the receiving stream?

No.

- If yes, please attach latest summary.
- If no, where is the nearest downstream monitoring station.

The nearest downstream DEQ water quality monitoring station with ambient data is Station 1aCUB008.60, located on Cub Run at the Route 661 bridge crossing. Outfall 001 drains to Sand Branch. Sand Branch is a tributary to Cub Run. Outfall 002 drains to an Unnamed Tributary to Cub Run. Station 1aCUB008.60 is located in Assessment Unit VAN-A22R_CUB02A02, which extends from the confluence with an unnamed tributary to Cub Run, approximately 0.41 rivermile downstream from the confluence with Cain Branch, and continues downstream until the confluence with Flatlick Branch. Station 1aCUB008.60 is located approximately 3.5 rivermiles downstream from Outfall 001 and 4.2 rivermiles downstream from Outfall 002. The following is a monitoring summary for Assessment Unit VAN-A22R_CUB02A02 as taken from the 2008 Integrated Assessment:

Class III, Section 7a, special stds. g.

DEQ ambient water quality monitoring station 1aCUB008.60, at Route 661 (Old Lee Highway). Citizen monitoring station 1aCUB-CR3-SOS.

Citizen monitoring finds a high probability of adverse conditions for biota, resulting in a designation of fully supporting with an observed effect for the aquatic life use. The wildlife use is considered fully supporting. The fish consumption and recreation uses were not assessed.

2. Is the receiving stream on the current 303(d) list?

No. Neither Sand Branch (Receiving Stream for Outfall 001) nor the Unnamed Tributary to Cub Run (Receiving Stream for Outfall 002) are listed as impaired on the 303(d) list.

- If yes, what is the impairment?

N/A

- Has the TMDL been prepared?

N/A

- If yes, what is the WLA for the discharge?

N/A

- If no, what is the schedule for the TMDL?

N/A

3. If the answer to (2) above is no, is there a downstream 303(d) listed impairment?

Yes. Both receiving streams eventually discharge into Cub Run. Portions of Cub Run are listed as impaired on the 303(d) list. In addition, Cub Run drains into Bull Run, which also has several impairments. The location of the impaired segments on Cub Run and Bull Run are as follows:

Cub Run Segment VAN-A22R_CUB01A00: Segment begins at the confluence with Ellick Run and continues downstream until the confluence with Bull Run.

Bull Run Segment VAN-A23R_BUL02A02: Segment begins at the confluence with Cub Run, at the start of watershed A23R, and continues downstream until the confluence with Popes Head Creek.

- If yes, what is the impairment?

Cub Run Segment VAN-A22R_CUB01A00 – Recreational Use Impairment: Sufficient excursions from the maximum *E. coli* bacteria criterion (4 of 19 samples - 21.0%) were recorded at DEQ's ambient water quality monitoring station (1aCUB002.61) at the Route

658 crossing to assess this stream segment as not supporting of the recreation use goal for the 2008 water quality assessment.

Bull Run Segment VAN-A23R_BUL02A02 – Aquatic Life Use Impairment: Two biological monitoring events in 2005 (1aBUL009.61), two biological monitoring events in 2004 (1aBUL010.28), and two biological events in 2005 (1aBUL011.12) each resulted in a VSCI score which indicates an impaired macroinvertebrate community.

Bull Run Segment VAN-A23R_BUL02A02 – Fish Consumption Use Impairment: The fish consumption use is categorized as impaired due to a Virginia Department of Health, Division of Health Hazards Control, PCB fish consumption advisory. The advisory, dated 12/13/04 and modified 07/27/05, limits consumption of carp and channel catfish to no more than two meals per month. The affected area includes Bull Run near Manassas Park from the I-66 bridge downstream approximately fourteen miles to the Route 612 (Yates Ford Road) bridge.

Additionally, fish tissue data revealed excursions of the water quality criterion based tissue value (TV) of 54 parts per billion (ppb) for polychlorinated biphenyls (PCBs) in two species of fish (channel catfish and flathead catfish) in 2001 and one specie (channel catfish) in 2004 at monitoring station 1aBUL010.28 (3 total excursions).

- Has a TMDL been prepared?

Cub Run Bacteria TMDL – No. The bacteria TMDL for Cub Run is scheduled to be completed by 2018. However, with the approval of the 2010 Assessment, a TMDL will not be required for this impaired segment because it is “nested” within the completed bacteria TMDL for Bull Run (EPA Approved 11/15/2006). The bacteria sources in this impaired segment were already taken into account during the development of the Bull Run Bacteria TMDL.

Bull Run Benthic TMDL – Yes. EPA Approved 09/26/2006.

Bull Run PCB TMDL – No

- Will the TMDL include the receiving stream?

The TMDLs will not specifically address the receiving streams, however, all upstream point source dischargers will be considered in TMDL development.

- Is there a WLA for the discharge?

While the Bull Run Benthic TMDL did list VA0090441 is the TMDL, it did not assign it a WLA. Because the facility discharges TSS, TMDL staff believes that the TMDL should have assigned this facility a WLA. In light of that, a WLA of **0.5 tons/year of sediment** has been established for VA0090441. The Bull Run Benthic TMDL included an allocation for the future growth and expansion of point sources in the watershed. The future growth allocation is more than enough to account for the WLA for this facility.

- What is the schedule for the TMDL?

Cub Run Bacteria TMDL – Nested, no TMDL Required.
Bull Run Benthic TMDL – Yes EPA Approved 09/26/2006.
Bull Run PCB TMDL – 2016

4. Is there monitoring or other conditions that Planning/Assessment needs in the permit?

No.

5. Fact Sheet Requirements – Please provide information on other individual VPDES permits or VA DEQ monitoring stations located within a 2 mile radius of the facility. In addition, please provide information on any drinking water intakes located within a 5 mile radius of the facility.

There are no DEQ monitoring stations within a 2 mile radius of the Outfall of VA0090441. However, there are multiple VPDES permits located within a 2 mile radius of two outfalls for this facility. Those facilities are:

VA0089541

VA0091430

There are no drinking water intakes within a 5 mile radius of this facility.

Average Flow (MGD)
0.05
0.0072
0.0005
0.0014
0.0144
0.0288
0.05
0.0029
0.0001
0.0001
0.0014
0.00144
0.0072
0.0288
0.0014
0.072
0.0288
0.0005
0.00144
0.0072
0.0144
0.001
0.00144
0.0038
0.0001
0.00144
0.00144
0.00072
0.00144

Average:

0.01141931

MGD

MGD	mg/l	l/day	mg/day
0.01090305	30.0	41,268.0	1,238,041.4

kg/day	kg/year	lbs/year	ton/year
1.2	451.9	995.5	0.5

Thompson, Alison (DEQ)

From: Conaway, Katie (DEQ)
Sent: Friday, July 23, 2010 12:23 PM
To: Thompson, Alison (DEQ)
Cc: Thomas, Bryant (DEQ); O'Reilly, Jennifer (DEQ)
Subject: Planning Statement for Adaptive Concrete
Attachments: Adaptive Concrete - 2 Mile.jpg; VA0090441 DMR Data and WLA Calculations.xls; VA0090441 Permit Planning Statement.doc

Hi Alison,

Attached is the planning statement for Adaptive Concrete. Note that I changed the information on Outfall 002. It discharges to a UT to Cub Run, rather than a UT to Sand Branch.

Also, Bryant, you might want to check this, but I had to calculate a WLA for sediment for this facility. It was not given a WLA under the Bull Run TMDL. I used the average flows and the TSS limit of 30 mg/L to come up with a WLA of 0.5 tons/year. I used the same approach that Djamel provided us for the Sunoco permit. The data I used to make the calculation are attached. The TMDL included 60 tons of sediment as a growth allocation, so I will make note of that in my tracking spreadsheet.

If you have any questions about what I did, please let me know.

Thanks,

Katie

Katie Conaway
Virginia Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, Virginia 22193
Phone: (703) 583-3804
Email: Katie.Conaway@deq.virginia.gov
Website: www.deq.virginia.gov

8/2/2010

FRESHWATER WATER QUALITY CRITERIA / WASTELOAD ALLOCATION ANALYSIS

Permit No.: VA0090441

Facility Name: Adaptive Concrete Solutions

Receiving Stream: Sand Branch and UT to Cub Run

Version: OWP Guidance Memo 00-2011 (8/24/00)

Stream Information			Stream Flows			Mixing Information			Effluent Information		
Mean Hardness (as CaCO3) =	50 mg/L		1Q10 (Annual) =	0 MGD		Annual - 1Q10 Mix =	100 %		Mean Hardness (as CaCO3) =	50 mg/L	
90% Temperature (Annual) =	20 deg C		7Q10 (Annual) =	0 MGD		- 7Q10 Mix =	100 %		90% Temp (Annual) =	20 deg C	
90% Temperature (Wet season) =	15 deg C		30Q10 (Annual) =	0 MGD		- 30Q10 Mix =	100 %		90% Temp (Wet season) =	15 deg C	
90% Maximum pH =	8 SU		1Q10 (Wet season) =	0 MGD		Wet Season - 1Q10 Mix =	100 %		90% Maximum pH =	8 SU	
10% Maximum pH =	SU		30Q10 (Wet season)	0 MGD		- 30Q10 Mix =	100 %		10% Maximum pH =	SU	
Tier Designation (1 or 2) =	1		30Q5 =	0 MGD					Discharge Flow =	0.05 MGD	
Public Water Supply (PWS) Y/N? =	n		Harmonic Mean =	0 MGD							
Trout Present Y/N? =	n										
Early Life Stages Present Y/N? =	y										

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria			Wasteload Allocations			Antidegradation Baseline			Antidegradation Allocations			Most Limiting Allocations		
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)
Acenaphthene	0	--	--	na	9.9E+02	--	--	na	9.9E+02	--	--	--	--	--	--	na
Acrolein	0	--	--	na	9.3E+00	--	--	na	9.3E+00	--	--	--	--	--	--	na
Acrylonitrile ^C	0	--	--	na	2.5E+00	--	--	na	2.5E+00	--	--	--	--	--	--	na
As ^C	0	3.0E+00	--	na	5.0E-04	3.0E+00	--	na	5.0E-04	--	--	--	--	3.0E+00	--	na
Barium	0	8.41E+00	1.71E+00	na	--	8.4E+00	1.7E+00	na	--	--	--	--	--	8.4E+00	1.7E+00	na
Benzene	0	8.41E+00	2.36E+00	na	--	8.4E+00	2.4E+00	na	--	--	--	--	--	8.4E+00	2.4E+00	na
Benzene ^C	0	--	--	na	4.0E+04	--	--	na	4.0E+04	--	--	--	--	--	--	na
Benzidine ^C	0	--	--	na	6.4E+02	--	--	na	6.4E+02	--	--	--	--	--	--	na
Benzene (a) anthracene ^C	0	3.4E+02	1.5E+02	na	--	3.4E+02	1.5E+02	na	--	--	--	--	--	3.4E+02	1.5E+02	na
Benzene (b) fluoranthene ^C	0	--	--	na	5.1E+02	--	--	na	5.1E+02	--	--	--	--	--	--	na
Benzene (k) fluoranthene ^C	0	--	--	na	2.0E-03	--	--	na	2.0E-03	--	--	--	--	--	--	na
Benzene (a) pyrene ^C	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	na
Bis(2-Chloroethyl) Ether ^C	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	na
Bis(2-Chloroisopropyl) Ether	0	--	--	na	5.3E+00	--	--	na	5.3E+00	--	--	--	--	--	--	na
Bis(2-Ethylhexyl) Phthalate ^C	0	--	--	na	6.5E+04	--	--	na	6.5E+04	--	--	--	--	--	--	na
Bromofom ^C	0	--	--	na	2.2E+01	--	--	na	2.2E+01	--	--	--	--	--	--	na
Butylbenzylphthalate	0	--	--	na	1.4E+03	--	--	na	1.4E+03	--	--	--	--	--	--	na
Cadmium	0	1.8E+00	6.6E-01	na	1.9E+03	1.8E+00	6.6E-01	na	--	--	--	--	--	1.8E+00	6.6E-01	na
Carbon Tetrachloride ^C	0	--	--	na	1.6E+01	--	--	na	1.6E+01	--	--	--	--	--	--	na
Chlordane ^C	0	2.4E+00	4.3E-03	na	8.1E-03	2.4E+00	4.3E-03	na	8.1E-03	--	--	--	--	2.4E+00	4.3E-03	na
Chloride	0	8.6E+05	2.3E+05	na	--	8.6E+05	2.3E+05	na	--	--	--	--	--	8.6E+05	2.3E+05	na
TRC	0	1.9E+01	1.1E+01	na	--	1.9E+01	1.1E+01	na	--	--	--	--	--	1.9E+01	1.1E+01	na
Chlorobenzene	0	--	--	na	1.6E+03	--	--	na	1.6E+03	--	--	--	--	--	--	na

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Chlorodibromomethane ^c	0	--	--	na	1.3E+02	--	--	na	1.3E+02	--	--	--	--	--	--	--	--	--	--	na	1.3E+02
Chloroform	0	--	--	na	1.1E+04	--	--	na	1.1E+04	--	--	--	--	--	--	--	--	--	--	na	1.1E+04
2-Chloronaphthalene	0	--	--	na	1.6E+03	--	--	na	1.6E+03	--	--	--	--	--	--	--	--	--	--	na	1.6E+03
2-Chlorophenol	0	--	--	na	1.5E+02	--	--	na	1.5E+02	--	--	--	--	--	--	--	--	--	--	na	1.5E+02
Chlorpyrifos	0	8.3E-02	4.1E-02	na	--	8.3E-02	4.1E-02	na	--	--	--	--	--	--	--	--	--	8.3E-02	4.1E-02	na	--
Chromium III	0	3.2E+02	4.2E+01	na	--	3.2E+02	4.2E+01	na	--	--	--	--	--	--	--	--	--	3.2E+02	4.2E+01	na	--
Chromium VI	0	1.6E+01	1.1E+01	na	--	1.6E+01	1.1E+01	na	--	--	--	--	--	--	--	--	--	1.6E+01	1.1E+01	na	--
Chromium, Total	0	--	--	1.0E+02	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Chrysene ^c	0	--	--	na	1.8E-02	--	--	na	1.8E-02	--	--	--	--	--	--	--	--	--	--	na	1.8E-02
Copper	0	7.0E+00	5.0E+00	na	--	7.0E+00	5.0E+00	na	--	--	--	--	--	--	--	--	--	7.0E+00	5.0E+00	na	--
Cyanide, Free	0	2.2E+01	5.2E+00	na	1.6E+04	2.2E+01	5.2E+00	na	1.6E+04	--	--	--	--	--	--	--	--	2.2E+01	5.2E+00	na	1.6E+04
DDD ^c	0	--	--	na	3.1E-03	--	--	na	3.1E-03	--	--	--	--	--	--	--	--	--	--	na	3.1E-03
DDE ^c	0	--	--	na	2.2E-03	--	--	na	2.2E-03	--	--	--	--	--	--	--	--	--	--	na	2.2E-03
DDT ^c	0	1.1E+00	1.0E-03	na	2.2E-03	1.1E+00	1.0E-03	na	2.2E-03	--	--	--	--	--	--	--	--	1.1E+00	1.0E-03	na	2.2E-03
Deineton	0	--	1.0E-01	na	--	--	1.0E-01	na	--	--	--	--	--	--	--	--	--	--	1.0E-01	na	--
Diazinon	0	1.7E-01	1.7E-01	na	--	1.7E-01	1.7E-01	na	--	--	--	--	--	--	--	--	--	1.7E-01	1.7E-01	na	--
Dibenz(a,h)anthracene ^c	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
1,2-Dichlorobenzene	0	--	--	na	1.3E+03	--	--	na	1.3E+03	--	--	--	--	--	--	--	--	--	--	na	1.3E+03
1,3-Dichlorobenzene	0	--	--	na	9.6E+02	--	--	na	9.6E+02	--	--	--	--	--	--	--	--	--	--	na	9.6E+02
1,4-Dichlorobenzene	0	--	--	na	1.9E+02	--	--	na	1.9E+02	--	--	--	--	--	--	--	--	--	--	na	1.9E+02
3,3-Dichlorobenzidine ^c	0	--	--	na	2.8E-01	--	--	na	2.8E-01	--	--	--	--	--	--	--	--	--	--	na	2.8E-01
Dichlorobromomethane ^c	0	--	--	na	1.7E+02	--	--	na	1.7E+02	--	--	--	--	--	--	--	--	--	--	na	1.7E+02
1,2-Dichloroethane ^c	0	--	--	na	3.7E+02	--	--	na	3.7E+02	--	--	--	--	--	--	--	--	--	--	na	3.7E+02
1,1-Dichloroethylene	0	--	--	na	7.1E+03	--	--	na	7.1E+03	--	--	--	--	--	--	--	--	--	--	na	7.1E+03
1,2-trans-dichloroethylene	0	--	--	na	1.0E+04	--	--	na	1.0E+04	--	--	--	--	--	--	--	--	--	--	na	1.0E+04
2,4-Dichlorophenol	0	--	--	na	2.9E+02	--	--	na	2.9E+02	--	--	--	--	--	--	--	--	--	--	na	2.9E+02
2,4-Dichlorophenoxy acetic acid (2,4-D)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
1,2-Dichloropropane ^c	0	--	--	na	1.5E+02	--	--	na	1.5E+02	--	--	--	--	--	--	--	--	--	--	na	1.5E+02
1,3-Dichloropropane ^c	0	--	--	na	2.1E+02	--	--	na	2.1E+02	--	--	--	--	--	--	--	--	--	--	na	2.1E+02
Dieldrin ^c	0	2.4E-01	5.6E-02	na	5.4E-04	2.4E-01	5.6E-02	na	5.4E-04	--	--	--	--	--	--	--	--	2.4E-01	5.6E-02	na	5.4E-04
Diethyl Phthalate	0	--	--	na	4.4E+04	--	--	na	4.4E+04	--	--	--	--	--	--	--	--	--	--	na	4.4E+04
2,4-Dimethylphenol	0	--	--	na	8.5E+02	--	--	na	8.5E+02	--	--	--	--	--	--	--	--	--	--	na	8.5E+02
Dimethyl Phthalate	0	--	--	na	1.1E+06	--	--	na	1.1E+06	--	--	--	--	--	--	--	--	--	--	na	1.1E+06
Di-n-Butyl Phthalate	0	--	--	na	4.5E+03	--	--	na	4.5E+03	--	--	--	--	--	--	--	--	--	--	na	4.5E+03
2,4-Dinitrophenol	0	--	--	na	5.3E+03	--	--	na	5.3E+03	--	--	--	--	--	--	--	--	--	--	na	5.3E+03
2-Methyl-4,6-Dinitrophenol	0	--	--	na	2.8E+02	--	--	na	2.8E+02	--	--	--	--	--	--	--	--	--	--	na	2.8E+02
2,4-Dinitrotoluene ^c	0	--	--	na	3.4E+01	--	--	na	3.4E+01	--	--	--	--	--	--	--	--	--	--	na	3.4E+01
Dioxin 2,3,7,8- tetrachlorodibenzo-p-dioxin	0	--	--	na	5.1E-08	--	--	na	5.1E-08	--	--	--	--	--	--	--	--	--	--	na	5.1E-08
1,2-Diphenylhydrazine ^c	0	--	--	na	2.0E+00	--	--	na	2.0E+00	--	--	--	--	--	--	--	--	--	--	na	2.0E+00
Alpha-Endosulfan	0	2.2E-01	5.6E-02	na	8.9E+01	2.2E-01	5.6E-02	na	8.9E+01	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	na	8.9E+01
Beta-Endosulfan	0	2.2E-01	5.6E-02	na	8.9E+01	2.2E-01	5.6E-02	na	8.9E+01	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	na	8.9E+01
Alpha + Beta Endosulfan	0	2.2E-01	5.6E-02	--	--	2.2E-01	5.6E-02	--	--	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	--	--
Endosulfan Sulfate	0	--	--	na	8.9E+01	--	--	na	8.9E+01	--	--	--	--	--	--	--	--	--	--	na	8.9E+01
Endrin	0	8.6E-02	3.6E-02	na	6.0E-02	8.6E-02	3.6E-02	na	6.0E-02	--	--	--	--	--	--	--	--	8.6E-02	3.6E-02	na	6.0E-02
Endrin Aldehyde	0	--	--	na	3.0E-01	--	--	na	3.0E-01	--	--	--	--	--	--	--	--	--	--	na	3.0E-01

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Ethylbenzene	0	--	--	na	2.1E+03	--	--	na	2.1E+03	--	--	--	--	--	--	--	--	--	--	na	2.1E+03
Fluoranthene	0	--	--	na	1.4E+02	--	--	na	1.4E+02	--	--	--	--	--	--	--	--	--	--	na	1.4E+02
Fluorene	0	--	--	na	5.3E+03	--	--	na	5.3E+03	--	--	--	--	--	--	--	--	--	--	na	5.3E+03
Foaming Agents	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Guthion	0	--	1.0E-02	na	--	--	1.0E-02	na	--	--	--	--	--	--	--	--	--	--	1.0E-02	na	--
Heptachlor ^C	0	5.2E-01	3.8E-03	na	7.9E-04	5.2E-01	3.8E-03	na	7.9E-04	5.2E-01	3.8E-03	na	7.9E-04	5.2E-01	3.8E-03	na	7.9E-04	5.2E-01	3.8E-03	na	7.9E-04
Heptachlor Epoxide ^C	0	5.2E-01	3.8E-03	na	3.9E-04	5.2E-01	3.8E-03	na	3.9E-04	5.2E-01	3.8E-03	na	3.9E-04	5.2E-01	3.8E-03	na	3.9E-04	5.2E-01	3.8E-03	na	3.9E-04
Hexachlorobenzene ^C	0	--	--	na	2.9E-03	--	--	na	2.9E-03	--	--	--	--	--	--	--	--	--	--	na	2.9E-03
Hexachlorobutadiene ^C	0	--	--	na	1.8E+02	--	--	na	1.8E+02	--	--	--	--	--	--	--	--	--	--	na	1.8E+02
Hexachlorocyclohexane	0	--	--	na	4.9E-02	--	--	na	4.9E-02	--	--	--	--	--	--	--	--	--	--	na	4.9E-02
Alpha-BHC ^C	0	--	--	na	1.7E-01	--	--	na	1.7E-01	--	--	--	--	--	--	--	--	--	--	na	1.7E-01
Beta-BHC ^C	0	--	--	na	1.8E+00	9.5E-01	--	na	1.8E+00	9.5E-01	--	--	--	9.5E-01	--	--	--	9.5E-01	--	na	1.8E+00
Hexachlorocyclohexane	0	--	--	na	1.1E+03	--	--	na	1.1E+03	--	--	--	--	--	--	--	--	--	--	na	1.1E+03
Gamma-BHC ^C (Lindane)	0	--	--	na	3.3E+01	--	--	na	3.3E+01	--	--	--	--	--	--	--	--	--	--	na	3.3E+01
Hexachlorocyclopentadiene	0	--	2.0E+00	na	--	--	2.0E+00	na	--	--	2.0E+00	na	--	--	2.0E+00	na	--	--	2.0E+00	na	--
Hexachloroethane ^C	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
Hydrogen Sulfide	0	--	--	na	na	--	--	na	na	--	--	--	--	--	--	--	--	--	--	na	na
Indeno (1,2,3-cd) pyrene ^C	0	--	--	na	na	--	--	na	na	--	--	--	--	--	--	--	--	--	--	na	na
Iron	0	--	--	na	9.6E+03	--	--	na	9.6E+03	--	--	--	--	--	--	--	--	--	--	na	9.6E+03
Isophorone ^C	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	0.0E+00	na	--	--	0.0E+00	na	--	--	0.0E+00	na	--
Kepone	0	4.9E+01	5.6E+00	na	--	4.9E+01	5.6E+00	na	--	4.9E+01	5.6E+00	na	--	4.9E+01	5.6E+00	na	--	4.9E+01	5.6E+00	na	--
Lead	0	--	1.0E-01	na	--	--	1.0E-01	na	--	--	1.0E-01	na	--	--	1.0E-01	na	--	--	1.0E-01	na	--
Malathion	0	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--
Manganese	0	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--
Mercury	0	1.4E+00	7.7E-01	--	--	1.4E+00	7.7E-01	--	--	1.4E+00	7.7E-01	--	--	1.4E+00	7.7E-01	--	--	1.4E+00	7.7E-01	--	--
Methyl Bromide	0	--	--	na	1.5E+03	--	--	na	1.5E+03	--	--	--	--	--	--	--	--	--	--	na	1.5E+03
Methylene Chloride ^C	0	--	--	na	5.9E+03	--	--	na	5.9E+03	--	--	--	--	--	--	--	--	--	--	na	5.9E+03
Methoxychlor	0	--	3.0E-02	na	--	--	3.0E-02	na	--	--	3.0E-02	na	--	--	3.0E-02	na	--	--	3.0E-02	na	--
Mirex	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	0.0E+00	na	--	--	0.0E+00	na	--	--	0.0E+00	na	--
Nickel	0	1.0E+02	1.1E+01	na	4.6E+03	1.0E+02	1.1E+01	na	4.6E+03	1.0E+02	1.1E+01	na	4.6E+03	1.0E+02	1.1E+01	na	4.6E+03	1.0E+02	1.1E+01	na	4.6E+03
Nitrate (as N)	0	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--
Nitrobenzene	0	--	--	na	6.9E+02	--	--	na	6.9E+02	--	--	--	--	--	--	--	--	--	--	na	6.9E+02
N-Nitrosodimethylamine ^C	0	--	--	na	3.0E+01	--	--	na	3.0E+01	--	--	--	--	--	--	--	--	--	--	na	3.0E+01
N-Nitrosodiphenylamine ^C	0	--	--	na	6.0E+01	--	--	na	6.0E+01	--	--	--	--	--	--	--	--	--	--	na	6.0E+01
N-Nitrosodi-n-propylamine ^C	0	--	--	na	5.1E+00	--	--	na	5.1E+00	--	--	--	--	--	--	--	--	--	--	na	5.1E+00
Nonylphenol	0	2.8E+01	6.6E+00	--	--	2.8E+01	6.6E+00	na	--	2.8E+01	6.6E+00	na	--	2.8E+01	6.6E+00	na	--	2.8E+01	6.6E+00	na	--
Parathion	0	6.5E-02	1.3E-02	na	--	6.5E-02	1.3E-02	na	--	6.5E-02	1.3E-02	na	--	6.5E-02	1.3E-02	na	--	6.5E-02	1.3E-02	na	--
PCB Total ^C	0	--	1.4E-02	na	6.4E-04	--	1.4E-02	na	6.4E-04	--	1.4E-02	na	6.4E-04	--	1.4E-02	na	6.4E-04	--	1.4E-02	na	6.4E-04
Pentachlorophenol ^C	0	7.7E-03	5.9E-03	na	3.0E+01	7.7E-03	5.9E-03	na	3.0E+01	7.7E-03	5.9E-03	na	3.0E+01	7.7E-03	5.9E-03	na	3.0E+01	7.7E-03	5.9E-03	na	3.0E+01
Phenol	0	--	--	na	8.6E+05	--	--	na	8.6E+05	--	--	--	--	--	--	--	--	--	--	na	8.6E+05
Pyrene	0	--	--	na	4.0E+03	--	--	na	4.0E+03	--	--	--	--	--	--	--	--	--	--	na	4.0E+03
Radionuclides	0	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--
Gross Alpha Activity (pCi/L)	0	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--
Beta and Photon Activity (mrem/yr)	0	--	--	na	4.0E+00	--	--	na	4.0E+00	--	--	--	--	--	--	--	--	--	--	na	4.0E+00
Radium 226 + 228 (pCi/L)	0	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--
Uranium (ug/l)	0	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--	--	--	na	--

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Selenium, Total Recoverable	0	2.0E+01	5.0E+00	na	4.2E+03	2.0E+01	5.0E+00	na	4.2E+03	--	--	--	--	--	--	--	--	2.0E+01	5.0E+00	na	4.2E+03
Silver	0	1.0E+00	--	na	--	1.0E+00	--	na	--	--	--	--	--	--	--	--	--	1.0E+00	--	na	--
Sulfate	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
1,1,2,2-Tetrachloroethane ^C	0	--	--	na	4.0E+01	--	--	na	4.0E+01	--	--	--	--	--	--	--	--	--	--	na	4.0E+01
Tetrachloroethylene ^C	0	--	--	na	3.3E+01	--	--	na	3.3E+01	--	--	--	--	--	--	--	--	--	--	na	3.3E+01
Thallium	0	--	--	na	4.7E-01	--	--	na	4.7E-01	--	--	--	--	--	--	--	--	--	--	na	4.7E-01
Toluene	0	--	--	na	6.0E+03	--	--	na	6.0E+03	--	--	--	--	--	--	--	--	--	--	na	6.0E+03
Total dissolved solids	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Toxaphene ^C	0	7.3E-01	2.0E-04	na	2.8E-03	7.3E-01	2.0E-04	na	2.8E-03	--	--	--	--	--	--	--	--	7.3E-01	2.0E-04	na	2.8E-03
Tributyltin	0	4.6E-01	7.2E-02	na	--	4.6E-01	7.2E-02	na	--	--	--	--	--	--	--	--	--	4.6E-01	7.2E-02	na	--
1,2,4-Trichlorobenzene	0	--	--	na	7.0E+01	--	--	na	7.0E+01	--	--	--	--	--	--	--	--	--	--	na	7.0E+01
1,1,2-Trichloroethane ^C	0	--	--	na	1.6E+02	--	--	na	1.6E+02	--	--	--	--	--	--	--	--	--	--	na	1.6E+02
Trichloroethylene ^C	0	--	--	na	3.0E+02	--	--	na	3.0E+02	--	--	--	--	--	--	--	--	--	--	na	3.0E+02
2,4,6-Trichlorophenol ^C	0	--	--	na	2.4E+01	--	--	na	2.4E+01	--	--	--	--	--	--	--	--	--	--	na	2.4E+01
2-(2,4,5-Trichlorophenoxy)propionic acid (Silvex)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Vinyl Chloride ^C	0	--	--	na	2.4E+01	--	--	na	2.4E+01	--	--	--	--	--	--	--	--	--	--	na	2.4E+01
Zinc	0	6.5E+01	6.6E+01	na	2.6E+04	6.5E+01	6.6E+01	na	2.6E+04	--	--	--	--	--	--	--	--	6.5E+01	6.6E+01	na	2.6E+04

Notes:

- All concentrations expressed as micrograms/liter (ug/l), unless noted otherwise
- Discharge flow is highest monthly average or Form 2C maximum for Industries and design flow for Municipals
- Metals measured as Dissolved, unless specified otherwise
- "C" indicates a carcinogenic parameter
- Regular WLAs are mass balances (minus background concentration) using the % of stream flow entered above under Mixing Information.
Antidegradation WLAs are based upon a complete mix.
- Antideg. Baseline = (0.25(WQC - background conc.) + background conc.) for acute and chronic
= (0.1(WQC - background conc.) + background conc.) for human health
- WLAs established at the following stream flows: 1Q10 for Acute, 30Q10 for Chronic Ammonia, 7Q10 for Other Chronic, 30Q5 for Non-carcinogens and Harmonic Mean for Carcinogens. To apply mixing ratios from a model set the stream flow equal to (mixing ratio - 1), effluent flow equal to 1 and 100% mix.

Metal	Target Value (SSTV)
Antimony	6.4E+02
Arsenic	9.0E+01
Barium	na
Cadmium	3.9E-01
Chromium III	2.5E+01
Chromium VI	6.4E+00
Copper	2.8E+00
Iron	na
Lead	3.4E+00
Manganese	na
Mercury	4.6E-01
Nickel	6.8E+00
Selenium	3.0E+00
Silver	4.2E-01
Zinc	2.6E+01

Note: do not use QL's lower than the minimum QL's provided in agency guidance

Public Notice – Environmental Permit

PURPOSE OF NOTICE: To seek public comment on a draft permit from the Department of Environmental Quality that will allow the release of treated stormwater into a water body in Loudoun County, Virginia.

PUBLIC COMMENT PERIOD: XXX, 2010 to 5:00 p.m. on XXX, 2010

PERMIT NAME: Virginia Pollutant Discharge Elimination System Permit – Stormwater issued by DEQ, under the authority of the State Water Control Board

APPLICANT NAME, ADDRESS AND PERMIT NUMBER: Adaptive Concrete Solutions, 4215 Lafayette Center Drive, Suite 1, Chantilly, VA 20151, VPDES Permit VA0090441

NAME AND ADDRESS OF FACILITY: Adaptive Concrete Solutions, 44146 Wade Rd, Chantilly VA 20151

PROJECT DESCRIPTION: NAME OF APPLICANT has applied for a reissuance of a permit for the private Adaptive Concrete Solutions. The applicant proposes to release treated industrial storm water at a variable rate into a water body. The facility proposes to release the treated industrial storm water in Sand Branch and an unnamed tributary to Cub Run in Loudoun County in the Potomac watershed. A watershed is the land area drained by a river and its incoming streams. The permit will limit the following pollutants to amounts that protect water quality: pH and Total Suspended Solids. Monitoring is included for flow, Total Petroleum Hydrocarbons, and Total Recoverable Iron.

HOW TO COMMENT AND/OR REQUEST A PUBLIC HEARING: DEQ accepts comments and requests for public hearing by e-mail, fax or postal mail. All comments and requests must be in writing and be received by DEQ during the comment period. Submittals must include the names, mailing addresses and telephone numbers of the commenter/requester and of all persons represented by the commenter/requester. A request for public hearing must also include: 1) The reason why a public hearing is requested. 2) A brief, informal statement regarding the nature and extent of the interest of the requester or of those represented by the requestor, including how and to what extent such interest would be directly and adversely affected by the permit. 3) Specific references, where possible, to terms and conditions of the permit with suggested revisions. A public hearing may be held, including another comment period, if public response is significant, based on individual requests for a public hearing, and there are substantial, disputed issues relevant to the permit.

CONTACT FOR PUBLIC COMMENTS, DOCUMENT REQUESTS AND ADDITIONAL INFORMATION: The public may review the documents at the DEQ-Northern Regional Office by appointment, or may request electronic copies of the draft permit and fact sheet.

Name: Alison Thompson

Address: DEQ-Northern Regional Office, 13901 Crown Court, Woodbridge, VA 22193

Phone: (703) 583-3834 E-mail: alison.thompson@deq.virginia.gov Fax: (703) 583-3821

**State "Transmittal Checklist" to Assist in Targeting
Municipal and Industrial Individual NPDES Draft Permits for Review**

Part I. State Draft Permit Submission Checklist

In accordance with the MOA established between the Commonwealth of Virginia and the United States Environmental Protection Agency, Region III, the Commonwealth submits the following draft National Pollutant Discharge Elimination System (NPDES) permit for Agency review and concurrence.

Facility Name:	Adaptive Concrete Solutions
NPDES Permit Number:	VA0090441
Permit Writer Name:	Alison L. Thompson
Date:	September 3, 2010

Major []

Minor [X]

Industrial [X]

Municipal []

I.A. Draft Permit Package Submittal Includes:

	Yes	No	N/A
1. Permit Application?	X		
2. Complete Draft Permit (for renewal or first time permit – entire permit, including boilerplate information)?	X		
3. Copy of Public Notice?	X		
4. Complete Fact Sheet?	X		
5. A Priority Pollutant Screening to determine parameters of concern?	X		
6. A Reasonable Potential analysis showing calculated WQBELs?	X		
7. Dissolved Oxygen calculations?			X
8. Whole Effluent Toxicity Test summary and analysis?			X
9. Permit Rating Sheet for new or modified industrial facilities?	X		

I.B. Permit/Facility Characteristics

	Yes	No	N/A
1. Is this a new, or currently unpermitted facility?		X	
2. Are all permissible outfalls (including combined sewer overflow points, non-process water and storm water) from the facility properly identified and authorized in the permit?	X		
3. Does the fact sheet or permit contain a description of the wastewater treatment process?	X		
4. Does the review of PCS/DMR data for at least the last 3 years indicate significant non-compliance with the existing permit?	X		
5. Has there been any change in streamflow characteristics since the last permit was developed?		X	
6. Does the permit allow the discharge of new or increased loadings of any pollutants?		X	
7. Does the fact sheet or permit provide a description of the receiving water body(s) to which the facility discharges, including information on low/critical flow conditions and designated/existing uses?	X		
8. Does the facility discharge to a 303(d) listed water?		X	
a. Has a TMDL been developed and approved by EPA for the impaired water?	X		
b. Does the record indicate that the TMDL development is on the State priority list and will most likely be developed within the life of the permit?	X		
c. Does the facility discharge a pollutant of concern identified in the TMDL or 303(d) listed water?	X		
9. Have any limits been removed, or are any limits less stringent, than those in the current permit?		X	
10. Does the permit authorize discharges of storm water?	X		

I.B. Permit/Facility Characteristics – cont.	Yes	No	N/A
11. Has the facility substantially enlarged or altered its operation or substantially increased its flow or production?		X	
12. Are there any production-based, technology-based effluent limits in the permit?		X	
13. Do any water quality-based effluent limit calculations differ from the State's standard policies or procedures?		X	
14. Are any WQBELs based on an interpretation of narrative criteria?		X	
15. Does the permit incorporate any variances or other exceptions to the State's standards or regulations?		X	
16. Does the permit contain a compliance schedule for any limit or condition?		X	
17. Is there a potential impact to endangered/threatened species or their habitat by the facility's discharge(s)?		X	
18. Have impacts from the discharge(s) at downstream potable water supplies been evaluated?	X		
19. Is there any indication that there is significant public interest in the permit action proposed for this facility?		X	
20. Have previous permit, application, and fact sheet been examined?	X		

Part II. NPDES Draft Permit Checklist

Region III NPDES Permit Quality Review Checklist – For Non-Municipals (To be completed and included in the record for all non-POTWs)

II.A. Permit Cover Page/Administration	Yes	No	N/A
1. Does the fact sheet or permit describe the physical location of the facility, including latitude and longitude (not necessarily on permit cover page)?	X		
2. Does the permit contain specific authorization-to-discharge information (from where to where, by whom)?	X		

II.B. Effluent Limits – General Elements	Yes	No	N/A
1. Does the fact sheet describe the basis of final limits in the permit (e.g., that a comparison of technology and water quality-based limits was performed, and the most stringent limit selected)?	X		
2. Does the fact sheet discuss whether “antibacksliding” provisions were met for any limits that are less stringent than those in the previous NPDES permit?	X		

II.C. Technology-Based Effluent Limits (Effluent Guidelines & BPJ)	Yes	No	N/A
1. Is the facility subject to a national effluent limitations guideline (ELG)?		X	
a. If yes, does the record adequately document the categorization process, including an evaluation of whether the facility is a new source or an existing source?			X
b. If no, does the record indicate that a technology-based analysis based on Best Professional Judgement (BPJ) was used for all pollutants of concern discharged at treatable concentrations?		X	
2. For all limits developed based on BPJ, does the record indicate that the limits are consistent with the criteria established at 40 CFR 125.3(d)?	X		
3. Does the fact sheet adequately document the calculations used to develop both ELG and /or BPJ technology-based effluent limits?	X		
4. For all limits that are based on production or flow, does the record indicate that the calculations are based on a “reasonable measure of ACTUAL production” for the facility (not design)?			X
5. Does the permit contain “tiered” limits that reflect projected increases in production or flow?		X	
a. If yes, does the permit require the facility to notify the permitting authority when alternate levels of production or flow are attained?			X
6. Are technology-based permit limits expressed in appropriate units of measure (e.g., concentration, mass, SU)?			X
7. Are all technology-based limits expressed in terms of both maximum daily, weekly average, and/or monthly average limits?			X
8. Are any final limits less stringent than required by applicable effluent limitations guidelines or BPJ?		X	

II.D. Water Quality-Based Effluent Limits	Yes	No	N/A
1. Does the permit include appropriate limitations consistent with 40 CFR 122.44(d) covering State narrative and numeric criteria for water quality?	X		
2. Does the record indicate that any WQBELs were derived from a completed and EPA approved TMDL?		X	
3. Does the fact sheet provide effluent characteristics for each outfall?	X		
4. Does the fact sheet document that a “reasonable potential” evaluation was performed?	X		
a. If yes, does the fact sheet indicate that the “reasonable potential” evaluation was performed in accordance with the State’s approved procedures?	X		
b. Does the fact sheet describe the basis for allowing or disallowing in-stream dilution or a mixing zone?	X		

II.D. Water Quality-Based Effluent Limits – cont.	Yes	No	N/A
c. Does the fact sheet present WLA calculation procedures for all pollutants that were found to have “reasonable potential”?	X		
d. Does the fact sheet indicate that the “reasonable potential” and WLA calculations accounted for contributions from upstream sources (i.e., do calculations include ambient/background concentrations where data are available)?		X	
e. Does the permit contain numeric effluent limits for all pollutants for which “reasonable potential” was determined?	X		
5. Are all final WQBELs in the permit consistent with the justification and/or documentation provided in the fact sheet?	X		
6. For all final WQBELs, are BOTH long-term (e.g., average monthly) AND short-term (e.g., maximum daily, weekly average, instantaneous) effluent limits established?	X		
7. Are WQBELs expressed in the permit using appropriate units of measure (e.g., mass, concentration)?	X		
8. Does the fact sheet indicate that an “antidegradation” review was performed in accordance with the State’s approved antidegradation policy?	X		

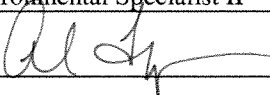
II.E. Monitoring and Reporting Requirements	Yes	No	N/A
1. Does the permit require at least annual monitoring for all limited parameters?	X		
a. If no, does the fact sheet indicate that the facility applied for and was granted a monitoring waiver, AND, does the permit specifically incorporate this waiver?			
2. Does the permit identify the physical location where monitoring is to be performed for each outfall?	X		
3. Does the permit require testing for Whole Effluent Toxicity in accordance with the State’s standard practices?			X

II.F. Special Conditions	Yes	No	N/A
1. Does the permit require development and implementation of a Best Management Practices (BMP) plan or site-specific BMPs?	X		
a. If yes, does the permit adequately incorporate and require compliance with the BMPs?	X		
2. If the permit contains compliance schedule(s), are they consistent with statutory and regulatory deadlines and requirements?			X
3. Are other special conditions (e.g., ambient sampling, mixing studies, TIE/TRE, BMPs, special studies) consistent with CWA and NPDES regulations?	X		

II.G. Standard Conditions		Yes	No	N/A
1. Does the permit contain all 40 CFR 122.41 standard conditions or the State equivalent (or more stringent) conditions?		X		
List of Standard Conditions – 40 CFR 122.41				
Duty to comply	Property rights	Reporting Requirements		
Duty to reapply	Duty to provide information	Planned change		
Need to halt or reduce activity	Inspections and entry	Anticipated noncompliance		
not a defense	Monitoring and records	Transfers		
Duty to mitigate	Signatory requirement	Monitoring reports		
Proper O & M	Bypass	Compliance schedules		
Permit actions	Upset	24-Hour reporting		
		Other non-compliance		
2. Does the permit contain the additional standard condition (or the State equivalent or more stringent conditions) for existing non-municipal dischargers regarding pollutant notification levels [40 CFR 122.42(a)]?		X		

Part III. Signature Page

Based on a review of the data and other information submitted by the permit applicant, and the draft permit and other administrative records generated by the Department/Division and/or made available to the Department/Division, the information provided on this checklist is accurate and complete, to the best of my knowledge.

Name	Alison L. Thompson
Title	Environmental Specialist II
Signature	
Date	9-14-10